

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

MDL NO. 16-2738 (FLW) (LGH)

THIS DOCUMENT RELATES TO ALL CASES

**PLAINTIFFS' FRCP 30b6 NOTICE OF TAKING ORAL
DEPOSITION OF THE PERSON MOST KNOWLEDGEABLE
OF JOHNSON & JOHNSON**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure, Plaintiffs, by and through the undersigned counsel, hereby notice the videotaped deposition upon oral examination of the Johnson & Johnson person most knowledgeable regarding the topics listed in Exhibit A in the above-referenced matter.

PLEASE TAKE FURTHER NOTICE that pursuant to the Federal Rules of Civil Procedure, Plaintiffs further request that the documents identified in Exhibit B be produced in advance of the deposition. The deposition will take place before a person authorized to administer oaths and will continue until completed at the following time and place:

September 15, 2021, at 10:00 a.m. (EST)
Conference Room at
Faegre, Drinker, Biddle & Reath
600 Campus Drive
Florham Park, NJ 07932

The deposition will be videotaped before a certified court reporter and may be used for the purposes of discovery or for use by Plaintiff as evidence at trial, or both. You are invited to appear and take part in the examination as you deem appropriate.

Dated: July 20, 2021

Respectfully submitted,

/s/ Michelle A. Parfitt

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

/s/ Michelle A. Parfitt

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EXHIBIT A

That representative of J&J with the most knowledge concerning when the documents referenced below were first produced in any litigation alleging personal injury from exposure to talc sold by Johnson and Johnson, Windsor Minerals Inc., Johnson and Johnson Consumer Inc. (and its predecessors):

1. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by the McCrone Institute;
2. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by the Colorado School of Mines;
3. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Johnson and Johnson;
4. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Frederick Pooley;
5. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by University of Minnesota;
6. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by CTFA;
7. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by members of the CTFA;
8. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by the Battelle Memorial Institute;
9. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Alice Blount;
10. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Cyprus Mines;
11. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Rio Tinto;
12. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Dartmouth College;
13. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by EMV Associates;
14. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Forensic Analytical;
15. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Imerys;
16. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Luzenac;
17. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Johns Manville;
18. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Seymour Lewin;
19. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Arthur Langer;

20. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Maywood Laboratories;
21. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Mountain States Research and Development;
22. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by RJ Lee;
23. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by Sperry Rand;
24. Results of testing to determine whether talc contained any amount of asbestos, chrysotile, tremolite, actinolite, and/or anthophyllite conducted by University of Cardiff.

EXHIBIT B

Documents to produce whether in possession of J&J or its counsel:

1. Any and all correspondence or discovery responses documenting when the documents referenced in 1-24 above were first produced in any litigation alleging personal injury from exposure to talc sold by Johnson and Johnson, Windsor Minerals Inc., (Johnson and Johnson Consumer Inc. (and its predecessors).